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10 *Attorneys for Debtors and Reorganized Debtors*

11 **UNITED STATES BANKRUPTCY COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **SAN FRANCISCO DIVISION**

14 **In re:**

15 **PG&E CORPORATION,**

16 **- and -**

17 **PACIFIC GAS AND ELECTRIC**  
18 **COMPANY,**

19 **Debtors.**

20  Affects PG&E Corporation  
21  Affects Pacific Gas and Electric Company  
22  Affects both Debtors

23 \* *All papers shall be filed in the Lead Case, No.*  
24 *19-30088 (DM).*

25 Bankruptcy Case No. 19-30088 (DM)

26 Chapter 11

27 (Lead Case) (Jointly Administered)

28 **DECLARATION OF KATHY LEDBETTER**  
**IN SUPPORT OF REORGANIZED**  
**DEBTORS' OBJECTION TO CLAIM**  
**(CLAIM NO. 58462, FILED OCTOBER 17,**  
**2019, OF SPIRO JANNINGS)**

**Response Deadline:**

**October 26, 2021, 4:00 p.m. (PT)**

**Hearing Information If Timely Response  
Made:**

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Kathy Ledbetter, hereby declare and state:

2 1. I am a Labor Relations Manager at Pacific Gas and Electric Company (the “Utility”),  
3 a position I have held since July 2006. I have personal knowledge of the facts set forth herein and,  
4 if called as a witness, could and would competently testify thereto. As a Labor Relations Manager,  
5 I am familiar with the collective bargaining agreements (“CBAs”) between International  
6 Brotherhood of Electrical Workers, Local 1245 and the Utility, governing the employment of the  
7 Utility’s fieldpersons, including former employee Spiro Jannings.

8 2. The CBAs are kept in the regular course of the Utility’s business. Attached hereto as  
9 Exhibit A is a true and correct copy of the CBA with Local 1245 operative at the time of Mr.  
10 Jannings’ termination on August 27, 2015.

11 3. The CBA requires just cause for the Utility to terminate employment in section 7.1.  
12 The CBA also requires all disputes under the CBA to be resolved through the grievance process and  
13 provides a five-step procedure for doing so in section 102.6.

14 4. As a Labor Relations Manager at the Utility, I have access to union members’  
15 grievance files, which are also kept in the regular course of the Utility’s business. The grievance  
16 documents are created contemporaneously or close in time to the events described therein.

17 5. I recently reviewed Mr. Jannings’ grievance file and determined that the grievance  
18 involving his termination on August 27, 2015, which is grievance file number 23334, advanced to  
19 Step 4 of the grievance process “Review Committee.” The parties (the Union and the Utility) agreed  
20 to settle the case at the Review Committee Step. A true and correct copy of the letter containing that  
21 agreement is attached hereto as Exhibit B. Because the parties settled the grievance, grievance  
22 23334 did not advance to Step 5, Arbitration.

23 I declare under penalty of perjury under the laws of the United States of America and  
24 California that the foregoing is true and correct.

25 Executed at \_\_\_\_\_ San Jose \_\_\_\_\_, California, this 5th day of October, 2021.

26   
27

Kathy Ledbetter

28 4845-3452-1086.1 / 101443-1005